

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE RESIDENTIAL CAPITAL, LLC, *et al.*,  
  
Debtors.

Case No. 12-12020 (MG)  
Chapter 11  
Jointly Administered

Objection Date: May 14, 2016 @ 4:00 p.m. (ET)  
Hearing Date: May 24, 2016 @ 10:00 am. (ET)  
Re: Docket No. \_\_\_\_\_

**NOTICE OF MOTION BY CLASS COUNSEL FOR THE *ROTHSTEIN* PLAINTIFFS  
(CLAIM NOS. 4074 AND 3966) FOR AN AWARD OF ATTORNEYS' FEES,  
REIMBURSEMENT OF LITIGATION EXPENSES, AND INCENTIVE AWARDS FOR  
THE NAMED PLAINTIFFS**

PLEASE TAKE NOTICE that, on April 26, 2016, Plaintiffs' Counsel and Plaintiffs' Special Bankruptcy Counsel (collectively, "Class Counsel") for the *Rothstein* Plaintiffs (Claim Nos. 4074 and 3966) filed the unopposed motion for an award of attorneys' fees, reimbursement of Litigation Expenses, and incentive awards for the named plaintiffs (the "Motion").

PLEASE TAKE FURTHER NOTICE that a hearing to consider the relief requested in the Motion (the "Final Approval Hearing") shall be held before the Honorable Martin Glenn, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New Courtroom 501, One Bowling Green, New York, New York 10004 (the "Bankruptcy Court") on May 24, 2016 at 10:00 a.m. (prevailing Eastern time), or as soon thereafter as counsel may be heard.

PLEASE TAKE FURTHER NOTICE that any objection to the relief requested in the Motion to be considered at the Final Approval Hearing must be in writing, conform to the Federal Rules of Bankruptcy Procedure, the Local Bankruptcy Rules for the Southern District of

New York and shall be filed with the Bankruptcy Court electronically in accordance with General Order M-399 (General Order M-399 and the User's manual for the Electronic Case Filing System can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov), the official website for the Bankruptcy Court) by registered users of the Bankruptcy Court's case filing system, and by all other parties-in-interest, on a 3.5 inch disk or CD-ROM, preferably in Portable Document Format, WordPerfect or any other Windows-based word processing format (with a hard copy delivered directly to Chambers) and served in accordance with General Order M-399 and in accordance with this Court's order, dated May 23, 2012, implementing certain notice and case management procedures [Docket No. 141], so as to be received no later than May 10, 2016 at 4:00 p.m. (prevailing Eastern Time) (the "Objection Deadline").

PLEASE TAKE FURTHER NOTICE that if no objection to the relief requested in the Motion is timely filed and served, the Bankruptcy Court may enter an order granting the final relief requested in a Motion without further notice or opportunity to be heard afforded to any party.

Dated: April 26, 2016  
New York, NY

Respectfully submitted,

**KIRBY McINERNEY LLP**

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